

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

MICHAEL A. CARDOZO  
*Corporation Counsel*

CAMILLE D. BARNETT  
Assistant Corporation Counsel  
Labor & Employment Law Division  
phone: (212) 788-8685  
fax: (212) 788-8877  
email: Cbarnett@law.nyc.gov

**NOT ENDORSED**

March 17, 2008

**Via Facsimile - (212) 805-7932**

Hon. Theodore H. Katz  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 1660  
New York, NY 10007

Re: Roydel Howe v. The City of New York, et al.  
Docket No. 07 Civ. 6079 (LTS) (THK)

Dear Judge Kaplan:

I am an Assistant Corporation Counsel in the Office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney for defendants the City of New York and the New York City Administration for Children's Services in the above-referenced action. Plaintiff alleges employment discrimination in violation of the Age Discrimination in Employment Act and Title VII of the Civil Rights Act of 1964. I write on behalf of the parties to respectfully request an extension of the time to complete discovery from April 1, 2008 to May 19, 2008. I have conferred with *pro se* plaintiff, Roydell Howe and he joins in the instant request. This is the parties' first request for an extension of time to complete discovery.

In particular, defendants have served Initial Disclosures and have served their 1<sup>st</sup> Set of Interrogatories and Request for Documents, and the instant request is necessary in order to provide plaintiff with thirty (30) days to respond to this discovery request prior to the close of discovery. Additionally, plaintiff has indicated that he recently served discovery requests and noticed depositions and the requested extension will allow defendants sufficient time to respond to these requests. Moreover, plaintiff has expressed interest in utilizing mediation and he would like additional time to explore Court-offered medication services. Finally, counsel has had

COPIES MAILED  
TO COUNSEL OF RECORD ON 3/18/08

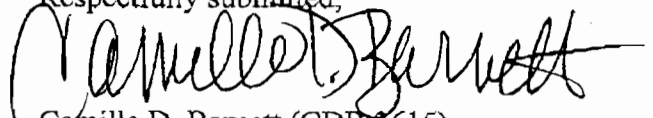
significant time constraints which occupy much of my schedule in the coming weeks. In particular, I have a hearing before the NYS Division of Human rights scheduled for March 24th and March 25th in the matter of Sweeney v. City of New York, et al., (Case No. 10118163), for which I must prepare. I also have a motion for summary judgment in the case of Boyd v. N.Y.C. Dep't of Parks & Recreation, 05 Civ. 6962 (KMW) (THK) due on March 21, 2008 and reply summary judgment papers due by March 31, 2008 in the case of Rollins v. NYC Department of Education, 06-3657 (LBS). This is in addition to 4 depositions in Valtchev v. NYC Dept of Education, (06 Civ. 7157 (NRB)) and eight noticed depositions in the case of Lewter v. City of New York, et al., in Supreme Court, Kings County Index No.: 24725/06.

For the foregoing reasons, the parties respectfully request an extension of time until May 19, 2008 to complete discovery in this action.

Thank you for your consideration of this request.

**MEMO ENDORSED**

Respectfully submitted,



Camille D. Barnett (CDB 3615)  
Assistant Corporation Counsel

cc: Via First Class Mail  
Roydel Howe  
Plaintiff Pro Se  
169-04 88<sup>th</sup> Avenue, #1J  
Jamaica, New York 11432

*The discovery deadline is  
extended to May 19, 2008.*

**SO ORDERED**

3/18/08



THEODORE H. KATZ  
UNITED STATES MAGISTRATE JUDGE